

Request for Waiver (USAC)

CC Docket No. 02-6 - CC Docket No. 96-45

To: FCC
Date: January 11, 2008
Re: 471 28 day waiting period waiver request

From Company Name: Watertown-Mayer Public Schools
Billed Entity Name: Watertown-Mayer Public Schools
Billed Entity Number 133622

Contact Information: Dan Sieling
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Form 470 # 53149000063080

To whom it may concern:

I am writing on behalf of Watertown-Mayer Public Schools to request a waiver of the 28 day waiting period required to file form 471. My district's form 470 was filed this morning, January 11, 2008, 8 hours after the January 10, 2008 deadline. According to the regulations, the consequence of this late filing means that we cannot file Form 471 until February 8, 2008, consequently missing the filing window deadline of February 7, 2008. I accept full responsibility for missing the deadline. However, I am asking for an a waiver because; 1) I believe 27.5 days will give all vendors adequate time to submit their proposals, and 2) losing one year of e-rate funding will put a severe financial burden on a district that already has a diminishing fund balance.

Reason for missing deadline: As stated above, I accept full responsibility for missing the deadline. There were some extenuating circumstances that contributed to the late filing. Our district opened a new elementary school this fall, completely remodeled our high school, and replaced all technology in our middle school data closets. We were not allowed to start placing technology in our new data closets until 1 week before school started. Needless to say, this fall was a very hectic time with many long days and nights of work. I am still dealing with construction issues on a daily basis. I started the 470 filing process late November of 2007. I believed I had completed the 470 filing, but in the confusion of the building process I did not finish. I had only completed the paper copy and had not filed the online form. I discovered my mistake this morning when I went to the USAC website to begin filing form 471 online. Only at that point did I realized I had not submitted our district's form 470.

27 day window: Most of our e-rate eligible expenses are either tariffed expenses or a continuation of a multi-year contract. There are two services that are on year to year contracts and I have already started the process of soliciting quotes for them. These two services only account for approximately 10% of our eligible expenses. I understand the need for a 28 day window, but in this instance I do not believe anyone will be hurt with a 27 day window.

Financial Consequences: Watertown-Mayer Public Schools is a small district with financial concerns. Opening a new school has resulted in a financial burden on our district. Although anticipated, we are facing a diminishing fund balance. E-rate has greatly helped finance our telecommunications and data communications over the past ten years. To lose e-rate funding, even for one year, will greatly impact our educational programs. Roughly estimating, I believe I may need to cut my budget by approximately 30% if we do not receive funding in 2008-2009.

In conclusion, I am asking that you please consider a waiver of the 28 day window requirement and allow my school district to File form 471 one day early. This will allow us to be in the 471 filing window and considered for e-rate funding for year 2008-2009. Once again, I realize it was my responsibility to assure form 470 was properly filed. I also know that a clerical error on my part is not a great reason for granting this waiver, but I do not feel that the integrity of the process will be compromised. I am also

concerned that students will suffer if we do not receive this year's funding. I have filed my district's e-rate documents each of the ten years the program has been in existence, and have never missed a deadline. I know this does not rationalize missing it this year, but I want you to know that I do not have a history of asking for waivers.

Thank you for your consideration in this matter.

Dan Sieling